

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

STATE OF OKLAHOMA, ex rel, )  
W. A. DREW EDMONDSON, )  
in his capacity as ATTORNEY GENERAL )  
OF THE STATE OF OKLAHOMA, )  
and OKLAHOMA SECRETARY )  
OF THE ENVIRONMENT )  
C. MILES TOLBERT, in his capacity as )  
the TRUSTEE FOR NATURAL RESOURCES )  
FOR THE STATE OF OKLAHOMA, )

Plaintiff, )

CASE NO. 05-CV-329-GKF- SAJ

V. )

TYSON FOODS, )  
TYSON POULTRY, INC., TYSON CHICKEN, INC., )  
COBB-VANTRESS, INC., AVIAGEN, INC., )  
CAL-MAINE FOODS, INC., )  
CAL-MAINE FARMS, INC., CARGILL, INC., )  
CARGILL TURKEY PRODUCTS, LLC, )  
GEORGE'S, INC., GEORGE'S FARMS, INC., )  
PETERSON FARMS, INC., SIMMONS FOODS, )  
INC. AND WILLOWBROOK FOODS, INC. )

Defendants. )

EXPERT WITNESS DECLARATION OF ROBERT S. LAWRENCE, MD

May 15, 2008

Ranch, Inc.; former Secretary of Agriculture Dan Glickman; and others.<sup>10</sup> Tom Hayes of Cargill Meats served on the Commission for the first eighteen months. The final report of the Commission was released in Washington, D.C. on April 29, 2008 with the summary conclusion that the current industrial farm animal production system poses unacceptable risks to public health, the environment and the welfare of animals themselves.<sup>11</sup>

I have testified before the Congress of the United States on the above mentioned subjects and have participated in briefings for Congressional staff on the relationship between industrial agriculture and public health. Prior to this case I had not testified in any state or federal court in the last fifteen years. I am compensated \$200 per hour for time spent on consultations as an expert witness in this case.

I have chaired committees of the Institute of Medicine that were commissioned to evaluate methods to reduce dioxin and dioxin-like compounds in the US food supply,<sup>12</sup> to assess the public health significance of radioactive Iodine from atmospheric nuclear tests in Nevada from 1950-1962 that contaminated the nation's milk supply,<sup>13</sup> to establish vaccine priorities for the 21<sup>st</sup> century,<sup>14</sup> to develop for the Office of Management and

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<sup>10</sup> *Putting Meat on the Table: Industrial Farm Animal Production in America*. A report of the Pew Commission on Industrial Farm Animal Production, April 2008. Appendix 3, p.107.

<sup>11</sup> Press release of the Pew Charitable Trusts. Available at: [http://www.pewtrusts.org/news\\_room\\_detail.aspx?id=38438](http://www.pewtrusts.org/news_room_detail.aspx?id=38438)

<sup>12</sup> *Dioxins and Dioxin-like Compounds in the Food Supply: Strategies to Decrease Exposure*. Committee on the Implications of Dioxin in the Food Supply (Lawrence RS, chair) Food and Nutrition Board, Institute of Medicine, National Academy Press, Washington, D.C., 2003, 318pp.

<sup>13</sup> *Exposure of the American people to iodine-131 from Nevada nuclear-bomb tests*. Committee on Thyroid Screening Related to I-131 Exposure (Lawrence RS, chair), 1999. Institute of Medicine, National Academy Press, Washington, D.C., 272pp.

<sup>14</sup> Stratton KR, Durch JS, and Lawrence RS, eds. 2000. *Vaccines for the 21<sup>st</sup> Century: A Tool for Decisionmaking*. Institute of Medicine, National Academy Press, Washington, D.C., 460pp.